Case 2:00-cv-02041 WLS Document 78-3 Filed 02/24/06 Page 1 of 26

J. Napor - by Mr. Sieminski

telephone and say I have left Hemdale, I'm now with Plaza, I look forward to doing business with you in my role at Plaza? How did that happen?

A. Well, as I mentioned before I think that's what happened. It may have been that I stayed in touch with him, I don't recall, but I do believe, I think it is probable that he contacted us after he started a new company. I honestly don't recall that.

Q. What was the first order that you received, you, WRS, received from Plaza?

A. I don't remember that, but the orders started small. Whatever it was it was a modest amount of money. As they got new titles and as they started expanding the distribution their orders increased, but our collections on account started slowing down. The bigger they got they had cash flow issues.

Q. Are there any documents or set of documents that you are aware of that are either in this room or perhaps elsewhere where you would be able to reconstruct the first set of orders from Plaza in the sense of what titles

EXHIBIT
tabbies
6

Case 2:00-cv-02041-WLS Document 78-13 Filed 02/24/06 Page 2 of 26

J. Napor - by Mr. Sieminski

they were for, what were the quantities and to whom those orders were shipped?

MR. GIBSON: Can I interrupt? Some of the stuff here --

MR. REILLY: You can look at some of the stuff here that is available. Don't answer until you look.

A. As I understand your question I don't think there was any reason for us to know that. As far as, I mean, once the manufacturing is done the next stage is collection, and once the bill is paid if the bill is paid in full the computer deletes the invoice because there is no reason to keep that. There would have been lots of records but not organized the way you are asking about. I will take a look through here and see if there is anything I can --

MR. GIBSON: I think at the very end there was a letter back in 1996.

THE WITNESS: On the bottom of this?

MR. GIBSON: Yes, the very bottom, there were records back in June 1996